

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X		
BERT C. ROBERTS, JR., Plaintiff	)	Civil Action
	)	
v.	)	Case No. 1:04-cv-04089-DLC
	)	
ASSOCIATED ELECTRIC & GAS	)	
INSURANCE SERVICES LIMITED, et al,	)	
Defendants	)	Judge Denise L. Cote
	)	
-----X		

**MOTION FOR ADMISSION OF  
MICHAEL R. GOODSTEIN PRO HAC VICE**

LOUIS A. SCARCELLA, an attorney duly admitted to the Bar of this Court, based upon the accompanying affidavit of Michael R. Goodstein, Esq., hereby moves the admission of Michael R. Goodstein, Esq., *pro hac vice*, as counsel to Associated Electric & Gas Insurance Service Limited, in the above-captioned case, to argue and try this action in whole or in part. Michael R. Goodstein, Esq. is a member in good standing of the Bar of the States of Maryland and Virginia, and is a member in good standing of the Bar of the District of Columbia. Mr. Goodstein is admitted to practice before the United States District Court for the Districts of Maryland, the Eastern District of Virginia and the Fourth Circuit Court of Appeals.

Dated: Uniondale, New York  
July 15, 2004

SCARCELLA ROSEN & SLOME LLP

By: /s/ Louis A. Scarcella  
Louis A. Scarcella (LS-3479)

Attorneys for Associated Electric & Gas  
Insurance Services Limited

333 Earle Ovington Boulevard  
Ninth Floor  
Uniondale, New York 11553  
(516) 227-1600

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X		
BERT C. ROBERTS, JR., Plaintiff	)	Civil Action
	)	
v.	)	Case No. 1:04-cv-04089-DLC
	)	
ASSOCIATED ELECTRIC & GAS	)	
INSURANCE SERVICES LIMITED, et al,	)	
Defendants	)	Judge Denise L. Cote
	)	
-----X		

**AFFIDAVIT OF MICHAEL R. GOODSTEIN, ESQ.**  
**SEEKING ADMISSION PRO HAC VICE**

MICHAEL R. GOODSTEIN, being duly sworn, deposes and says:

1. I am a member of the firm of Bailey Cavalieri LLC, One Columbus, 10 West Broad Street, Columbus, Ohio 43215.
2. I make this Affidavit in accordance with Local Rule 1.3(c) of the Local Rules of the United States District Court for the Southern and Eastern Districts of New York in support of my application for admission pro hac vice.
3. I received a B.A. degree from Brandeis University in 1986 and a Juris Doctorate from The American University, Washington College of Law in 1989. I am a member in good standing of the Bar of the District of Columbia and of the Bar of the States of Maryland and Virginia, admitted to practice before all state Courts in Maryland since 1989 and in Virginia since 1991. Annexed to this affidavit is a certificate of good standing issued by the Clerk of the Court of Appeals of Maryland, a certificate of good standing issued by the Virginia State Bar and a certificate of good standing issued by the Deputy Clerk, District of Columbia Court of Appeals.

4. I am also admitted to practice in the United States District Court for the Districts of Maryland, the Eastern District of Virginia and the Fourth Circuit Court of Appeals .

5. I have never been held in contempt of court, censured, suspended or disbarred by any court. No disciplinary matters are now pending against me.

6. Associated Electric & Gas Insurance Services Limited has requested that Bailey Cavalieri LLC represent it in this action, with me serving as one of its principal counsel.

7. I am familiar with the provisions of Judicial Code (Title 28 U.S.C.), which pertains to the jurisdiction of and practice in the United States District Court; the Federal Rules of Civil Procedure and the Federal Rules of Evidence; and the Code of Professional Responsibility of the American Bar Association. I have reviewed a copy of the Local Civil Rules of the United States District Court for the Southern District of New York, and undertake to abide by them.

/s/ Michael R. Goodstein  
MICHAEL R. GOODSTEIN

Sworn to before me this  
12<sup>th</sup> day of July, 2004

/s/ Janet M. Dawson  
Notary Public  
Notary Public State of Ohio  
My Commission Expires 05-12-09



District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D. C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

MICHAEL R. GOODSTEIN

was on the 10<sup>TH</sup> day of SEPTEMBER, 1990

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on December 4, 2003.

GARLAND PINKSTON, JR., CLERK

By: *G. Jackson*

Deputy Clerk

Jeannie P. Dahnk, President  
P.O. Box 207  
Fredericksburg, Virginia 22404-0207  
Telephone: (540) 373-8600

David P. Bobzien, President-elect  
P.O. Box 8695  
Reston, Virginia 20195-8695  
Telephone: (703) 324-2603

Bernard J. DiMuro, Immediate Past President  
DiMuro, Ginsberg and Mook, P.C.  
908 King Street, Suite 200  
Alexandria, Virginia 22314-3018  
Telephone: (703) 684-4333

Barbara Ann Williams  
Bar Counsel



# Virginia State Bar

Eighth and Main Building  
707 East Main Street, Suite 1500  
Richmond, Virginia 23219-2800  
Telephone: (804) 775-0500

Facsimile: (804) 775-0501 TDD: (804) 775-0502

Thomas A. Edmonds  
Executive Director and  
Chief Operating Officer

Mary Yancey Spencer  
Deputy Executive Director

Elizabeth L. Keller  
Assistant Executive Director  
for Bar Services

Susan C. Busch  
Assistant Executive Director  
for Administration

*December 1, 2003*

## ***CERTIFICATE OF GOOD STANDING***

*THIS IS TO CERTIFY THAT MICHAEL ROBERT GOODSTEIN IS AN ACTIVE MEMBER OF THE VIRGINIA STATE BAR IN GOOD STANDING. MR. GOODSTEIN WAS LICENSED TO PRACTICE LAW IN VIRGINIA ON OCTOBER 5, 1990, AFTER SUCCESSFULLY PASSING THE BAR EXAMINATION GIVEN BY THE VIRGINIA BOARD OF BAR EXAMINERS.*

*SINCERELY,*

A handwritten signature in black ink, appearing to read "Thomas A. Edmonds". The signature is stylized with a large, bold "T" and "E".

THOMAS A. EDMONDS  
EXECUTIVE DIRECTOR AND  
CHIEF OPERATING OFFICER

# Court of Appeals of Maryland

Annapolis, MD



## ***CERTIFICATE OF GOOD STANDING***

STATE OF MARYLAND, ss:

*I, Alexander L. Cummings, Clerk of the Court of Appeals of Maryland,  
do hereby certify that on the 18th day of December, 1989,*

**MICHAEL ROBERT GOODSTEIN**

*having first taken and subscribed the oath prescribed by the Constitution and  
Laws of this State, was admitted as an attorney of said Court, is now in good  
standing, and as such is entitled to practice law in any of the Courts of said  
State, subject to the Rules of Court.*

**In Testimony Whereof,** *I have hereunto set  
my hand as Clerk, and affixed the Seal of the  
Court of Appeals of Maryland, this 1st  
day of December, 2003.*

*Alexander L. Cummings*

*Clerk of the Court of Appeals of Maryland*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X		
BERT C. ROBERTS, JR., Plaintiff	)	Civil Action
	)	
v.	)	Case No. 1:04-cv-04089-DLC
	)	
ASSOCIATED ELECTRIC & GAS	)	
INSURANCE SERVICES LIMITED, et al,	)	
Defendants	)	Judge Denise L. Cote
	)	
-----X		

**ORDER GRANTING MOTION FOR  
ADMISSION OF  
MICHAEL R. GOODSTEIN PRO HAC VICE**

Louis A. Scarcella, Esq., a member in good standing of the Bar of this Court, having moved for the admission of Michael R. Goodstein, Esq., for admission *pro hac vice*, to argue and try this action in whole or in part, and the Court having read and filed the Affidavit of Michael R. Goodstein, Esq., sworn to on July 12, 2004, and there being no objections and after due deliberation, it is hereby

ORDERED, that Michael R. Goodstein, Esq., be admitted to the Bar of this Court *pro hac vice* to argue and try this action in whole or in part on behalf of defendant Associated Electric & Gas Insurance Services Limited.

Dated: New York, New York  
July \_\_, 2004

---

Honorable Denise L. Cote  
United States District Judge